



Plunket



Plunket Submission on Healthy Homes Standards

21 October 2018

Introduction

“I see a lot of cold to the bone and damp houses with mould in them. Quite simply the houses cannot retain the heat. Sometimes there are no curtains or holes in the floors and often no source of heating. This means cold homes and sick kids. The worst part is that this has become the norm and there are no housing options. Families are basically forced to stay in these inadequate homes as there is nothing else available.”

–Hawkes’ Bay Plunket Community Karitane.

Plunket works with families across Aotearoa and sees first-hand the damage poor quality housing does to children’s health and well-being. The evidence is irrefutable that housing conditions have an effect on health and many New Zealand tamariki and their whānau who live in damp, cold, dark houses experience poor health outcomes that can span lifetimes and even generations.¹

This submission represents the combined experiences of our staff and volunteers, all of whom work towards our vision that in the first 1,000 days we can make the difference of a lifetime.

Our vision is underpinned by three strategic goals:

Healthy tamariki – *We make sure every child/tamariki has the opportunity to be as healthy and well as they can be.*

Confident whānau – *We build the confidence and knowledge of whānau and families across New Zealand.*

Connected Communities – *We make sure no family/whānau is left isolated, disconnected or unable to cope.*

Children and rental accomodation

Plunket sees more than 85% of all new babies in New Zealand and we are in the unique position of visiting families in their home. Every day, we see many families living in unhealthy housing situations. Families are living in houses that are cold, damp and mouldy. The price of renting is increasing and availability of rental housing is declining. Overcrowding is rife. Houses are being divided up and rented by the room.

Approximately 450,000 households (around one million New Zealanders) live in rented accommodation² and many of those households contain children (an increase from 26% to 43% from 1986 to 2013). It is also concerning to note that at least six percent of our population live in homes with major dampness or mould problems, and 10 percent live in crowded conditions.

Household crowding is linked to a number of health conditions, including rheumatic fever, meningococcal disease, respiratory infections and skin infections.³

New Zealand must do better for its children. Housing is a key modifiable determinant of health and well-being for children⁴, and increasing the quality of housing available for rent in Aotearoa is an essential step in investing in the well-being of all children.

¹ Baker MG, Barnard LT, Kvalsvig A, et al. Increasing incidence of serious infectious diseases and inequalities in New Zealand: a national epidemiological study. *Lancet*. 2012;379(9821):1112–9.

² 2013 Census QuickStats about housing.

³ Expert Advisory Group on Solutions to Child Poverty. *Solutions to child poverty in New Zealand: Evidence for action*. Wellington: Office of the Children's Commissioner, 2012.

⁴ Baker MG, Howden-Chapman P. Time to invest in better housing for New Zealand children. *NZ Med J*. 2012;125(1367)

Plunket is committed to the vision of all children in New Zealand having a warm dry healthy home and does what we can to help families who live in poor housing. Our frontline staff often advocate for individual families, writing letters to housing agencies for example. Sometimes we are successful in helping families to be rehoused or have heat pumps installed.

Plunket strongly supports the intent of the Healthy Homes Standards to recognise the important role housing quality has on health outcomes. Introducing firm standards to improve the housing stock quality is a welcome step forward to improving the well-being for all children.

In assessing the proposed options, Plunket has asked itself – *which option will have the largest positive impact on children’s health and wellbeing?* It is this barometer that should be used to select the best options. We can no longer compromise when it comes to the health of our children. Some of the proposed options do not go far enough to protect every child from the impacts of poor housing quality.

Key Recommendations

1. The health and well-being of children and families must be the first and paramount consideration

- 1.1 Implement options that will have the greatest impact for children and their families.
- 1.2 Implement monitoring and enforcement measure to ensure the standards are upheld to achieve the most significant impact on children’s health.
- 1.3 Emphasise the importance of healthy housing for children and reflect the responsibility of landlords to provide healthy homes in all campaigns.

2 There must be a focus on reducing inequity - the role of Te Tiriti o Waitangi

- 2.1 That Te Tiriti o Waitangi should underpin the Health Homes standards and reducing inequity, particularly for Māori as tangata whenua, is considered and prioritised.

3 Housing exists in a holistic system and cannot be considered in isolation

- 3.1 That government continue to take a whole of systems approach to improving the state of housing in for tamariki and whānau.
- 3.2 That the Healthy Homes Standards are linked to and seen in conjunction with the Child Poverty Reduction Bill, Child Wellbeing Strategy, Reform of the Residential Tenancies Act 1986, Electricity Price Review and any other legislation or initiatives that have the potential to have collective impact on the health and well-being of children and their whanāu.

4 Insulation

- 4.1 That insulation should be prioritized before all other standards.
- 4.2 That all existing and new insulation must be aligned to the “2008 Building Code” (option three).
- 4.3 That the exemptions set out under the 2016 regulations should not be allowed.
- 4.4 That retrofitting wall insulation requirements should be included in the insulation standard.
- 4.5 That the minimum thickness for ceiling insulation should only be able to have a degradation level of 10% (i.e. 140-160mm under 2008 Building Code insulation standards).
- 4.6 That landlords should have to retain and make available records that show compliance within the required implementation timeframe.

5 Heating

- 5.1 That landlords be required to provide heating devices in both living rooms and bedrooms.
- 5.2 That the heaters that landlords provide must be capable of achieving an indoor temperature of at least 20°C.
- 5.3 That landlords must provide fixed and portable heating devices to heat required rooms.
- 5.4 That a class of acceptable heating devices should be created for those devices that are efficient, healthy and affordable for the heating standard.
- 5.5 That unflued gas heaters should be made illegal.

6 Ventilation

- 6.1 That extractor fans are installed in rooms with a bath or shower or indoor cooktop; and living rooms, dining rooms, kitchens and bedrooms have windows that can be opened.

7 Moisture ingress and drainage

- 7.1 That landlords provide efficient drainage and guttering, downpipes and drains and ensure that the subfloor has a ground moisture barrier unless there is already adequate subfloor ventilation.

8 Draught stopping

- 8.1 That a clear, measurable standard is put in place for stopping any unnecessary gaps or holes that cause noticeable draughts (in this instance option two implies this step).

9 Date to comply with the standards

- 9.1 That the implementation dates are staggered prioritising the standards that will make the most significant impact on children's health and well-being outcomes. Plunket believes that this means prioritising insulation and heating standards.

10 Implementation

- 10.1 That government requires a system of compulsory Warrant of Fitness for rental housing throughout the country.

The Healthy Homes Standards

1. The health of children and families must be the first and paramount consideration

Plunket believes that the health of children and families must be prioritised above all other considerations when determining the healthy homes standards.

Children often have no or limited say in terms of what type of housing conditions they live in. We cannot assume that their housing needs are automatically met when adults' housing needs are met. Housing standards need to ensure children's needs are a key consideration as this work underpins their future health and wellbeing.

This may mean going with the more expensive options for landlords, but we believe compromises should never be made when it comes to children's health and wellbeing. We believe that we cannot afford not to make these choices, given New Zealand's poor performance in relation to children's wellbeing relative to OECD countries, particularly with regards to housing conditions⁵.

The United Nations Convention on the rights of the child (UNCROC) clearly states that

"Parties, in accordance with national conditions and within their means, shall take appropriate measures to assist parents and others responsible for the child to implement this right and shall in case of need provide material assistance and support programmes, particularly with regard to nutrition, clothing and housing".

The State has the responsibility to provide a regulatory framework to enable the provision of a healthy home. This shift would acknowledge the need for a better balance between landlords and families that emphasises the importance of partnership. It would also recognise the essential role landlords have in this partnership in ensuring that children's right to a safe and healthy home environment is met.

Recommendations:

- 1.1 Implement options that will have the greatest impact for children and their families.
- 1.2 Implement monitoring and enforcement measure to ensure the standards are upheld to achieve the most significant impact on children's health.
- 1.3 Emphasise the importance of healthy housing for children and reflect the responsibility of landlords to provide healthy homes in all campaigns.

2. There must be a focus on reducing inequity - the role of Te Tiriti o Waitangi

There is a clear and increasing disproportionate representation relating to the concentration of particular groups living in unhealthy homes. The causes of inequitable health outcomes are complex and generally linked to the uneven distribution of the determinants of health, such as income, housing, education and employment. For example, low income or poverty is a key indicator of poor child health outcomes. It often leads to poor-quality accommodation with consequent overcrowding, and susceptibility to infectious diseases⁶.

⁵ Ref: Children's Housing Futures. Public Policy & Research / CRESA. For the centre for Housing Research, Aotearoa New Zealand. April 2010

⁶ Children's Housing Futures. Public Policy & Research / CRESA. For the centre for Housing Research, Aotearoa New Zealand. April 2010

A 2013 Statistics NZ study of Māori and Pacific home ownership in New Zealand pointed to a declining trend in land and home ownership for Māori, with only 28.2 per cent of Māori owning a house in the 2013 census. This indicates that Māori are more likely to be living in rental properties and are more likely to experience the negative side-effects of not owning a home, including poor health and life expectancy due to the quality of rental dwellings.⁷

A New Zealand epidemiological study published in the Lancet found that people of Māori and Pacific ethnicity are especially affected by poor quality rental housing⁸, contributing to the overall poorer health outcomes. Māori children are almost twice as likely to be hospitalised as other New Zealand children and an analysis of the 2006/07 New Zealand Health Survey found that Māori children continue to experience poorer health outcomes than other New Zealand children⁹.

Plunket is committed to Te Tiriti o Waitangi and believes that any regulatory framework should be underpinned by Te Tiriti o Waitangi. In addition, specific consideration should be applied to reducing the inequity of health outcomes faced by Māori and Pacific whānau.

Recommendation:

2.1 That Te Tiriti o Waitangi should underpin the Health Homes standards and reducing inequity, particularly for Māori as tangata whenua, is considered and prioritised.

3. Housing exists in a system and cannot be considered in isolation

Just as a child exists in the wider context of their family and community, housing quality exists within a wider system of influencing factors. Plunket believes that there needs to be a whole of systems approach to improving the state of housing for tamariki and whānau.

Power and fuel poverty

“The top issue for a mum when I visited was her cold place. I asked about heating and was told the only thing she has is a fan heater however is reluctant to use due to the cost and limited money coming into the household. This is not uncommon. Some families are using the oven to heat their houses.”-Bay of Plenty Plunket Nurse.

“Families often need to use electricity for heating which they won’t do as it is unaffordable.” – Hawkes’ Bay Karitane.

In New Zealand, fuel poverty is estimated to affect 25% of households, yet its crucial effect on children is largely unrecognized¹⁰. Plunket nurses see many families living in poverty or with limited financial means who struggle to heat their homes, even when there are heating options available.

In the *Growing Up in New Zealand* study, when the infants were nine months of age, 11% of mothers reported that their babies were living in homes where no heating was used and nearly one in five

⁷ <https://www.stats.govt.nz/assets/Reports/Changes-in-home-ownership-patterns-19862013-Focus-on-Maori-and-Pacific-people/chang>

⁸ Baker MG, Telfar Barnard L, Kvalsvig A, Verrall A, Zhang J, Keall M, et al. *Increasing incidence of serious infectious diseases and inequalities in New Zealand: A national epidemiological study*. The Lancet. 2012; 379:1112-9.

⁹ Children’s Housing Futures. Public Policy & Research / CRESA. For the centre for Housing Research, Aotearoa New Zealand. April 2010

¹⁰ Fuel poverty, policy, and equity in New Zealand: The promise of prepayment metering Kimberley Clare O’Sullivan*, Philippa L. Howden-Chapman, Geoffrey M. Fougere. *Energy Research & Social Science* 7 (2015) 99–107

families (18%) with infants reported 'putting up with feeling cold' to save on heating costs. Children living in more deprived areas were more likely to live in homes where no heating was used.¹¹

We must also consider the role the cost of power has on families being able to provide warm homes for their tamariki.

Plunket welcomed the government's winter heating costs subsidy introduced this year, but believes that more needs to be done to ensure families can afford to heat their homes and live in houses warm enough to improve health outcomes.

The state of the current rental market – rent prices, housing availability and residential mobility

"There are no housing options. Families are basically forced to stay in these inadequate homes as there are very few available homes for rent adding additional strain during what is already a vulnerable period of life." – Waikato Plunket Nurse.

New Zealand's rent prices, particularly in main centres, are increasing and the number of rental houses on the market is rapidly declining¹². Plunket nurses are seeing many families who have difficulty paying rent and or finding more suitable, healthy and affordable housing for their families. This can mean that families opt to stay in houses that are cold and damp, and have implications for the health of their children.

Many people have expressed concerns that upgrading rental housing to meet standards will increase rents. We have to take steps to mitigate these risks without compromising on housing quality. Plunket supports the Reform of the Residential Tenancies Act 1986 and the proposed changes to improve the stability of housing for families as a first step towards addressing this issue.

Recommendations:

- 3.1 That government continue to take a whole of systems approach to improving the state of housing in for tamariki and whānau.
- 3.2 That the Healthy Homes Standards are linked to and seen in conjunction with the Child Poverty Reduction Bill, Child Wellbeing Strategy, Reform of the Residential Tenancies Act 1986, Electricity Price Review and any other legislation or initiatives that have the potential to have collective impact on the health and well-being of children and their whānau

Responses to the Discussion Document

4. Insulation

Insulation is the most important measure for keeping a house warm and prioritizing improvements to insulation will make the biggest difference for children's health outcomes.

Insulation and clean heating have been shown to have a very strong cost benefit ratio (3.9) and most of the benefits arise from the installation of insulation.¹³ Insulation helps houses retain heat in the

¹¹ Morton, S.M.B., Atatoa Carr, P.E., Grant, C.C., Lee, A.C., Bandara, D.K., Mohal, J., Kinloch, J.M., Schmidt, J.M., Hedges, M.R., Ivory, V.C., Kingi, T.R., Liang, R., Perese, L.M., Peterson, E., Pryor, J.E., Reese, E., Robinson, E.M., Waldie, K.E., and Wall, C.R., *Growing Up in New Zealand: A longitudinal study of New Zealand children and their families. Report 2: Now we are born*. Auckland, 2012.

¹²<https://www.beehive.govt.nz/sites/default/files/201802/A%20Stocktake%20Of%20New%20Zealand's%20Housing.pdf>

¹³ Healthy Homes Standards. Discussion document. September 2018 MBIE

most cost and energy efficient way. Considering the impact of fuel poverty on families and their ability to heat their homes, the biggest difference can first be made by improving insulation.

Recommendation:

4.1 Plunket believes insulation should be prioritized before all other standards.

Which of the options (one, two or three) for the minimum level of insulation required do you support?

Options	Ceiling requirements	Underfloor requirements
Option One (status quo + continue)	Insulation installed before 1 July 2016 must be replaced or 'topped up' if below: <ul style="list-style-type: none"> • minimum R-value of 1.9, or 1.5 if in a building of high thermal mass construction 	Insulation installed before 1 July 2016 must be replaced or 'topped up' if below: <ul style="list-style-type: none"> • 0.9
	Installed from 1 July 2016 + continue from 1 July 2019: <ul style="list-style-type: none"> • 2.9 if the home is located in zones 1 or 2 • 3.3 if located in zone 3 	Installed from 1 July 2016 + continue from 1 July 2019: <ul style="list-style-type: none"> • 1.3
Option Two (akin to "2001 Building Code")	Existing insulation must be replaced or 'topped up' if below: <ul style="list-style-type: none"> • 1.9 if the home is located in zones 1 or 2 • 2.5 if located in zone 3 	Existing insulation must be replaced or 'topped up' if below: <ul style="list-style-type: none"> • 1.3
	All new insulation installed must be at least: <ul style="list-style-type: none"> • 2.9 if the home is located in zones 1 or 2 • 3.3 if located in zone 3 	All new insulation installed must be at least: <ul style="list-style-type: none"> • 1.3
Option Three (akin to "2008 Building Code")	All existing and new insulation must be at least: <ul style="list-style-type: none"> • 2.9 if the home is located in zones 1 or 2 • 3.3 if located in zone 3 	All existing and new insulation must be at least: <ul style="list-style-type: none"> • 1.3

Plunket supports option three with regards to the minimum level of insulation required for ceiling and underfloor insulation. This is because it provides the highest R-value for insulation and is most likely to achieve a warm and healthy home. A single clear standard applied to all rental homes will support widespread compliance and reduce the likelihood of disputes and related costs for enforcement.

Plunket acknowledges that the compliance timeframes may be longer with selection of this option, but that the end result will be a higher minimum standard for all rental stock.

Do you agree that the exceptions set out in the 2016 regulations should continue under the proposed insulation standard (e.g. when it is not reasonably practicable to install insulation)? Please explain.

Plunket does not support the exemption for those who complied with requirements at the time the insulation was installed, as currently allowed under the 2016 regulations¹⁴. All houses that can have insulation should meet the minimum required standard.

All children deserve to live in a warm and healthy home and experience better health outcomes associated with living in a house that meets the highest standards. This should not be determined by their landlord's previous compliance.

¹⁴ Part 2 of Residential Tenancies (Smoke Alarms and Insulation) Regulations 2016.

Do you think any other requirements for insulation should be included in the standard and, if so, what?

While insulating ceiling and floors are important first steps in improving New Zealand homes, un-insulated walls and single glazed wooden frame windows account for more than 60% of the remaining heat losses through housing fabrics. A study of basic retrofit packages, only including ceiling and floor insulation, found that these common interventions supported by governmental subsidies are not sufficient to effectively reduce energy consumption or sufficiently increase house temperatures¹⁵.

Studies illustrate how effective results can be achieved with comprehensive retrofit interventions that combine insulation of ceilings, floors, walls, and windows to reduce energy consumption, reduce the impact of fuel poverty and create healthy warm dry homes.

Retrofitting wall insulation requirements should be included in the insulation standard, as ceiling and underfloor insulation alone does little to raise the room temperature or retain heat.

Do you support option one or two to assess a “reasonable condition” for insulation? Please explain.

Table 2: Minimum thickness of existing ceiling insulation under “reasonable condition” option one

Minimum level of insulation (see section 2.1)	Minimum R-value when originally installed	Minimum thickness for ceiling insulation”	Estimated additional number of rental homes requiring a ceiling insulation upgrade compared to 2016 regulations
Option one (status quo)	1.9	70 mm	0
Option two (2001 insulation standard)	1.9 – 2.5	70 – 90mm	10,000
Option three (2008 insulation standard)	2.9 – 3.3	100 – 120 mm	80,000

Table 3: Minimum thickness of existing ceiling insulation under “reasonable condition” option two

Minimum level of insulation (see section 2.1)	Minimum R-value when originally installed	Minimum thickness for ceiling insulation	Estimated additional number of rental homes requiring a ceiling insulation upgrade compared to 2016 regulations
Option one (status quo)	1.9	90 mm	40,000
Option two (2001 insulation standard)	1.9 – 2.5	90 – 120 mm	70,000
Option three (2008 insulation standard)	2.9 – 3.3	140 – 160 mm	190,000

Plunket supports option two with regard to the assessment of “reasonable condition “of insulation. Option two is more likely to meet the objective of making rental homes warmer and drier. This option will reap benefits for a greater number of children and their families. Additionally option two will mean a reduction in energy use so this will result in cost savings for families with regard to heating costs.

It is also important to note that insulation must be installed correctly and maintained properly to ensure that it achieves optimal results.

Do you agree landlords should show compliance with the insulation standard by retaining particular records? If so, which records should be retained? Please explain.

¹⁵ Leardini, P., & Manfredini, M. (2015) Modern Housing Retrofit: Assessment of upgrade packages to EnerPHit standard for 1940-1960 state houses in Auckland

Landlords should have to retain records so that there is evidence they have complied with the standards within the required timeframe. Records should be available to prospective tenants so they can be assured the property they are considering meets the required standards. It should also be clear in the record that this standard has been assessed by a suitably qualified assessor within a required timeframe. For consistency and clarity this information could also be included in the tenancy agreement and available for audit and insurance purposes.

5. Heating

Do you support option one or two for the location of heating devices that landlords must provide in rental homes? Please explain your reason.

Options Summary: location of the heating device in a rental home	
Option One (status quo)	Living room only (includes kitchen and dining room if open plan rental home)
Option Two	Living room (includes kitchen and dining room if open plan rental home) and bedrooms

Plunket supports Option two and believes that landlords should have to provide heating devices in living rooms and bedrooms.

Plunket nurses often see families in very unhealthy conditions and where they are in the position of only being able to heat one room and as a result choose to sleep in there.

“I see families who all decide to sleep in the living room to keep the heat in one room and sleep on mattresses or mats. There is a lot of SUDI risk with this and I also often see an increase in respiratory illnesses.”

– Auckland Plunket Nurse

“Often we have families who, over the winter months, don’t use their bedrooms as they can’t afford to heat the whole house. So they will just heat the living areas and drag their mattresses out and sleep on the floor, so everyone is sleeping in the same room. This means no living space and people sleeping very close together. This means that if a family member becomes unwell it is more likely to spread to everyone else. With this there is also temptation to co-sleep which has huge SUDI risks.”

– Christchurch Plunket Nurse.

Families heating and sleeping in one room is linked to issues associated with overcrowding and increased incidence of communicable disease. Evidence links living in over-crowded conditions with communicable diseases such as meningococcal disease, acute rheumatic fever and tuberculosis among children.

Plunket believes that only providing heating in the living rooms will continue to drive this behaviour and that we will continue to see families opting to sleep in the one room that they are able to heat.

Plunket also believes that children should be able to make use of more than just one room in their houses and should be able to sleep in warm and dry bedrooms, something that is important particularly for babies and young children during winter months. Young children are particularly vulnerable to poor health outcomes connected to unhealthy housing. This is directly connected to

their ages and stage of development.¹⁶ Babies and children spend a lot of time at home¹⁷ particularly in the winter when the impact of unhealthy housing is most likely to become evident. They are also more likely than adults to be affected by poor quality air as their lungs and respiratory systems are developing up until the age of six.

Providing this option should be a requirement of landlords.

Do you support option one or two above on whether landlords should provide heating devices that are capable of reaching 18°C or 20°C in room(s) covered by the heating standard? Please explain.

Options Summary: indoor temperature that heating devices should be sized for in a rental home	
Option One	Heaters that landlords provide must be capable of achieving an indoor temperature of at least 18°C in rooms applicable to the heating standard
Option Two	Heaters that landlords provide must be capable of achieving an indoor temperature of at least 20°C in rooms applicable to the heating standard

Plunket rejects both options provided and suggests a third option that requires landlords to provide heating that is capable of achieving an indoor temperature of at least 21°C.

The rationale for this is that 21°C is the ambient indoor temperature required for children as recommended by the World Health Organisation. Given all homes in New Zealand require some form of heating, particularly during the winter months, this option is more likely to result in increased positive health outcomes for all but particularly for at risk groups which includes children.

The issue of ambient air temperature is particularly significant for young children as their bodies are more affected by variations than adults or teens¹⁸. In addition their higher metabolic rate means they breathe higher air volume per body weight. Unfortunately this results in young children taking in more air and this results in increased sickness if the air is cold damp air or contains mould spores.¹⁹

As children spend much more of their time than adults on the floor and given that heat rises and the temperature on the floor is likely to be lower the objective of heating to 21°C rather than 20°C or 18°C will have more significant benefits for young children and families.

Do you support option one or two for heating devices to be provided by a landlord in a rental home?

Options Summary: heating devices landlords should provide in rental homes	
Option One	Landlords only provide (fixed) heating devices in cases where portable electric heaters are insufficient to heat the required rooms
Option Two	Landlords must provide fixed and portable heating devices to heat the required rooms

¹⁶ Bearer, C. F., *Future Child*, "Environmental health hazards: how children are different from adults", 5(2): 11-26. United States, 1995.

¹⁷ Ministry of Business, Innovation and Employment, *Regulatory Impact Statement: Smoke alarms and insulation in residential rental properties*. Wellington, June 2015. <http://www.mbie.govt.nz/publications-research/publications/housing-and-property/ris-smoke-alarms-insulation-residential-rental-properties.pdf> (Downloaded 22 June 2016).

¹⁸ Because young children's surface area to body mass ratio is higher.

¹⁹ Bearer, C. F., *Future Child*, "Environmental health hazards: how children are different from adults", 5(2): 11-26. United States, 1995.

Plunket supports Option two, that landlords should be required to provide both fixed and portable heating devices, as this option is most likely to achieve the objective of a warm dry home and will ensure that all tenants will be able to heat their homes to the appropriate temperature.

Option two also provides tenants, who cannot afford to buy a heater, an option for being able to still heat their homes. This is particularly important in instances where a fixed heating device alone is not going to achieve the recommended ambient temperature.

Requiring landlords to provide portable heaters also allows families to heat other rooms in the household should they need to and have flexibility to meet the needs of their family's requirements.

Plunket would also like to highlight that safety is a factor requiring careful consideration with regard to heating devices. In many situations both fixed and portable heaters will require the installation of guards to protect residents from burns and injuries.

Do you agree that a class of acceptable heating devices is created for those devices that are efficient, healthy and affordable for the heating standard? Please explain. Do you agree that the heating devices listed above (unflued heaters, open fires etc) should be not acceptable for the heating standard? Please explain. What other types of heating, if any, do you think should be acceptable or not acceptable in the heating standard? Why?

Plunket agrees that a class of acceptable heating devices should be created for those devices that are efficient, healthy and affordable for the heating standard.

Plunket also strongly believes that the heating devices listed above (unflued heaters, open fires etc.) should not be acceptable for the heating standard.

In particular, Plunket recommends a step further should be taken with regards to unflued gas heaters and that they should be made illegal. Plunket has been concerned about the use of them in residential housing for many years.

These heaters are still in common usage in homes across the country²⁰, despite labelling and provision of information to consumers about their dangers. In some cases they may be favored by families in rental housing as they are portable, seen as cheaper than heaters powered by electricity, and can be used if the power has been cut off²¹.

These heaters pose a number of health risks due to the polluting gases they release (nitrogen dioxide and carbon monoxide). As well as producing a number of pollutants as a result of combustion, unflued gas heaters also produce water vapour that can indirectly affect health by increasing the growth of moulds and dust mites. Recent research has found that some people including children are more susceptible to the increase in the level of indoor air pollutants and the incidence of respiratory symptoms than others. Health effects include increased rates of hospital admissions, emergency department presentations, days off school or work, and mortality.²²

²⁰ Morton, S.M.B., Atatoa Carr, P.E., Grant, C.C., Lee, A.C., Bandara, D.K., Mohal, J., Kinloch, J.M., Schmidt, J.M., Hedges, M.R., Ivory, V.C., Kingi, T.R., Liang, R., Perese, L.M., Peterson, E., Pryor, J.E., Reese, E., Robinson, E.M., Waldie, K.E., and Wall, C.R., *Growing Up in New Zealand: A longitudinal study of New Zealand children and their families. Report 2: Now we are born*. Auckland, 2012.

²¹ <http://www.health.govt.nz/your-health/healthy-living/environmental-health/household-items-and-electronics/unflued-gas-heaters>

²² Howden-Chapman, P., Pierse, N., Nicholls, S., Gillespie-Bennett, J., Viggers, H., Cunningham, M., . . . Crane, J. (2008). Effects of improved home heating on asthma in community dwelling children: randomised controlled trial. *The British Medical Journal*, 337, online. doi: 10.1136/bmj.a1411

6. Ventilation

Do you support option one, two or three to provide adequate ventilation in rental homes? Please explain.

Option Summary: Appropriate ventilation for landlords to provide	
Option One (status quo)	<p>Every bathroom has at least one window that directly opens to the outside air unless other adequate means of ventilation are provided to the satisfaction of the local authority</p> <p>Each habitable room has at least one window that directly opens to the outside air unless other adequate means of ventilation are provided to the satisfaction of the local authority</p> <p>Every room which is not a habitable room shall be provided with such window or windows as the local authority may consider necessary for adequate ventilation</p>
Option Two	Extractor fans installed in rooms with a <i>bath or shower</i> , and living rooms, dining rooms, kitchens, and bedrooms have windows that can be opened for the entry of air unless an exemption applies
Option Three	Extractor fans installed in rooms with a <i>bath or shower or indoor cooktop</i> , and living rooms, dining rooms, kitchens, and bedrooms have windows that can be opened for the entry of air unless an exemption applies

Plunket supports Option Three, that extractor fans installed in rooms with a bath or shower or indoor cooktop and living rooms, dining rooms kitchens and bedrooms have windows that can be opened for entry of air unless an exemption applies. We believe that his option is the most likely to achieve the objective of a healthy and dry home.

We believe that, when supported by both landlords and tenants, this option would be the most likely to aid in significant improvements for families' living conditions. It would also mean that tenants who are able to use mechanical ventilation will have the means to make their homes drier and less mouldy and so will be less likely to experience poor health outcomes such as respiratory illness.

This is a particular area of concern as Plunket Nurses are reporting dampness and mould being common problems families face in the houses they visit every day across the country.

7. Moisture ingress and drainage

Do you support option one or two above to address the problems identified with moisture ingress and inadequate drainage in New Zealand rental homes? Why/Why not?

Option Summary: Moisture ingress and drainage	
Option One (status quo)	Landlords continue to meet the requirements of the Building Code, Residential Tenancies Act and the Housing Improvement Regulations
Option Two	Landlords provide efficient drainage and guttering, downpipes and drains and ensure that the subfloor has a ground moisture barrier, unless there is already adequate subfloor ventilation

Plunket supports option two, that landlords provide efficient drainage and guttering, downpipes and drains and ensure that the subfloor has a ground moisture barrier, unless there is already adequate subfloor ventilation as this is the option that is the most likely to achieve the objective of a healthy dry home. Despite all measures being taken to address moisture generated inside a home, achieving a reduction in moisture will not occur if measures are not taken to prevent externally generated moisture from entering the home.

We also note that the cost benefit analysis (given that the benefits on health, reduced heating costs, school attendance, decreased property maintenance, mental health and subjective well-being and comfort could not be quantified) did show that if the benefits were greater than \$52.40 per year per house that option two would be economical.

“In my 10 years of working for Plunket, three years in a high needs community I have never seen such hardships. I often see cold damp housing where the chill permeates through the floors where I sit to complete my assessments.” – Waikato Plunket Nurse.

8. Draught stopping

Do you support option one or two above to stop draughts and create warm and dry rental homes? Why?

Option: Draught stopping	
Option One (status quo)	Landlords are required to ensure walls and ceilings of every habitable room, bathroom, kitchen or kitchenette, hall and stairway shall be sheathed, plastered, rendered or otherwise treated and shall be maintained to the satisfaction of the local authority. Every floor shall be kept in a good state of repair free from crevices, holes and depressions
Option Two	Landlords to stop any unnecessary gaps or holes that cause noticeable draughts and a colder rental home, and: <ul style="list-style-type: none"> • are 3 millimetres or greater in and around windows and doors, walls, ceilings, floors and access hatches • block any decommissioned chimneys and fireplaces.

Plunket believes that option two is the preferable option because it is most likely to contribute to lifting the quality New Zealand’s rental housing stock and achieving warm, dry homes. As a house’s heat is lost through gaps or holes, it is important to address draughts in these standards. There is clear evidence base that gains of 1-1.5°C in ambient room temperatures can be achieved by minor draught stop interventions²³.

Although, at the moment, tenants can talk to landlords about addressing draughts in the home, there are no clear standards that define what this means or provides assurance for implementation. The importance of choosing option two is that it provides clarity for tenants and landlords in addressing draughts and the subsequent heat loss.

9. Date to comply with the standards

Do you support option one, two or three above for the date that landlords need to comply with the standards for their rental homes? Why/why not?

Option	Implementation
Option One	Landlords must comply with the standards within 90 days of the start or renewal of a tenancy
Option Two	A single date is chosen for when all landlords must comply with the standards
Option Three	The implementation dates are staggered for the standards either by <ul style="list-style-type: none"> • Standard • Rental home location

²³ Rangiwhetu, L. Pierse, N. Howden-Chapman, P. (2017). Effects of minor household interventions to block draughts on social housing temperatures: a before and after study. *Kotuitui: New Zealand Journal of Social Sciences Online*. 12:2. p241.

Plunket does not support option one as families who are in longer term tenancy agreements may not experience the benefits of the healthy homes standards for a longer period of time, and Plunket believes that no family should be disadvantaged as a result of their existing tenancy agreement.

Plunket believes that the dates should be staggered for implementation with a focus on prioritising the standards that are going to make the biggest impact and difference for children's health outcomes, focusing first on insulation and heating. In addition to this, Plunket believes that the staggering could also prioritise populations with higher needs, for example upgrading houses that children live in first and houses in high deprivation areas.

10. Implementation

We know that the status quo is not working. Families are living in cold damp homes and this is affecting health outcomes for children.

We believe that it is the landlord's responsibility and obligation to provide a warm healthy home. It cannot solely be the responsibility of tenants to highlight and bring about enforcement and we know that taking landlords to the tenancy tribunal is not always a positive experience for tenants.

There needs to be a change to ensure that all landlords comply with the new standards when they are introduced.

In addition to requiring landlords to retain documentation to show compliance with standards, Plunket recommends a system of compulsory Warrant of Fitness for rental housing throughout the country.

Consideration should also be given to whether we should have a system of inspection (of a representative sample of rental housing stock) of rental houses. We have a shortage of robust data on rental housing quality, and we know tenants with children are reluctant to take complaints against landlords. A system such as this would require inspections and the maintenance of records to support compliance with the healthy home standards and annual public reporting on the level of compliance.²⁴

From Plunket's perspective, if the law is not enforced, that becomes a public health issue and one that impacts first and foremost on young children.

Recommendation:

- 10.1 That government requires a system of compulsory Warrant of Fitness for rental housing throughout the country.

Conclusion

We know that rental homes across the country are often cold, damp and mouldy. We know that many landlords do not provide healthy or safe homes for our tamariki and whānau to live in. Every day Plunket Nurses across New Zealand see children living in houses that are contributing to poor health and well-being outcomes.

Plunket welcomes the setting and maintenance of clear healthy home standards as a positive first step towards improving the quality of housing for children and their families. Standards that put

²⁴ Child Poverty Action Group campaign for healthy affordable homes see <https://www.cpag.org.nz/campaigns/healthy-and-affordable-housing/>

children's health and well-being first have the potential to make the difference of a lifetime and create generational change.

"I am increasingly seeing landlords renting houses out by the room." -Plunket Nurse.

"A lot of families are living in houses that have no insulation and no heating." -Plunket Nurse.

"Some of these houses, you wouldn't even want to put your dog in. It is often questionable as to whether some of the houses our families live in are even liveable." -Plunket Nurse.

"It is really heart breaking when you can see parents trying their absolute best but they still have so much against them. Something needs to change. We just need to keep hoping." -Plunket Nurse.